



WALLULA
GENERATION LLC

Comment Submission 18

Scott A. Noll
Vice President, Development

snoll@newportgen.com

Direct (949) 823-3004

April 11, 2002

Ms. Irina Makarow
Project Manager
Washington Energy Facility
Site Evaluation Council
925 Plum Street SE, Building 4
P.O. Box 43172
Olympia, WA 98504-3172

Dear Irina:

Enclosed herewith are Wallula Generation, LLC's comments to the Draft EIS (DEIS) for the Wallula Power Project and Wallula-McNary Transmission Line Project issued in February 2002. We have organized our comments by Chapter for ease of review. As you know, any project evolves in its design details as the project progresses. Because virtually all of the changes being considered are within the "environmental envelope" covered by the DEIS, we only have provided comments to those items that are of particular note. All of the air comments pertain to revised information that was submitted to EFSEC in Volume 3 to the ASC in October 2002, but not incorporated into the DEIS.

As always, if you, other EFSEC staff members or Jones and Stokes have any questions please feel free to call or e-mail me at your convenience.

Chapter 1. Summary

The applicant has accepted the WSDOT proposed single access road from Dodd Road for both construction and operations.

18-1

Chapter 2. Proposed Action and Alternatives

There is no longer a temporary construction access road linking the site to Highway 12. All access will be via Dodd road.

18-2

Natural gas pipeline construction would start in July 2003 and finish in October 2003 according to recent information provided by Gas Transmission Northwest.

18-3

Chapter 3.2. Air Quality

The Wallula Power Project is not a major source of hazardous air pollutants (HAP) and is therefore not subject to NESHAP requirements. In the initial Facility Environmental Report, data was taken from Section 6.1, Volume 1 of Applicant's ASC submitted to EFSEC in August 2001, specifically **Table 6.1.5.2.4-5 Wallula Power Project Toxic Air Pollutant Emissions Summary**. This table was corrected and included as part of a re-submitted **Section 6.1 Wallula Power Project NOC/PSD Permit Application**, contained in Volume 3 of Applicant's ASC submitted to EFSEC in October 2001. This change was not incorporated into the Facility Environmental Report or the Draft EIS. The differences between the two tables are as follows:

- a. Sulfuric acid was listed as a Federal Hazardous Pollutant in the Volume 1 table—it is not and this was noted in the Volume 3 table.
- b. Formaldehyde emissions were stated at their uncontrolled limits in the Volume 1 table. In the revised Volume 3 table, the effect of 80% formaldehyde control from the CO catalyst system was included, so formaldehyde emissions fall below the 10-ton per year individual HAP limit to 5.1 tons per year.
- c. Other changes to the table included a decrease in Acetaldehyde by 80% for the same reason, a decrease in ammonia emissions (not a listed Federal HAP) because of a reduction in base load ammonia slip from 10 ppm to 5 ppm (duct firing operations remain at 10 ppm slip), and an increase in sulfuric acid emissions from 2.8 tons per year to 18.68 tons per year due to a higher assumed average fuel sulfur content based upon measurements by TransCanada Pipeline Company.
- d. Total HAP emissions fell from 37.1 tons per year to 15.52 tons per year, below the 25 ton per year aggregate HAP trigger limit for NESHAP requirements.

18-4

After completion of the BACT Analysis, Applicant made a decision to reduce the requested permit levels for NO_x from 3.0 to 2.5 ppm and for CO from 3.5 to 2.0 ppm and increase the requested permit level for sulfuric acid due to adjustments in the assumed short-term worst case and average annual fuel sulfur contents. A revised **Section 6.1 Wallula Power Project NOC/PSD Permit Application** was submitted to EFSEC and Ecology as part of the Volume 3 ASC submittal October 2001. The revised emissions modeling determined that criteria pollutant emissions from the plant will be slightly less than those presented in the DEIS. Additionally, the revised modeling indicated that sulfuric acid emissions will increase slightly from those shown in the DEIS.

18-5

Updated CALPUFF modeling for regional air quality impact assessment, also submitted as part of **Section 6.1 Wallula Power Project NOC/PSD Permit Application**, ASC Volume 3, indicated that SO₂, NO_x, and PM 10 emissions will be less than those originally calculated. Refer to **Section 6.1 Wallula Power Project NOC/PSD Permit Application**, ASC Volume 3 for the revised PSD modeling analysis results and tables.

18-6

Chapter 3.3. Water Resources

At the recommendation of the Washington Department of Ecology, captured stormwater within the bermed area will not be captured for on-site re-use. Rather, this water will be captured and then treated with an oil water separation unit and then discharged to the unlined stormwater detention and percolation pond. As a result, there will be no need to secure a water right to allow the use of this water.

18-7

To accommodate this change, the lined stormwater detention pond will be eliminated and the unlined stormwater detention pond will be increased in size to about 2.2 acres.

Chapter 3.9 Noise

Wallula Generation is committed to addressing the Walla Walla County noise regulations. These are slightly more restrictive than the state regulations identified in the DEIS. The discrepancy should be addressed in the FEIS.

18-8

These reflect the comments to the DEIS by Wallula Generation, LLC. Should you have any questions regarding these comments, please feel free to call me.

Sincerely,

Scott A. Noll

Cc.: Don Rose, BPA
Kevin Freeman, Entrix
Darrel Peebles
Robert Divers
William Popenuck
Steve LeClerc

**Responses to Comment Submission 18,
Letter from Scott A. Noll, Wallula Generation LLC**

- 18-1. Please see response to comment 13-1.
- 18-2. Please see response to comment 13-1.
- 18-3. This information about the construction schedule has been included in Chapter 1 of this Final EIS.
- 18-4. We agree with this comment. Section 3.2 of the Draft EIS has been revised to indicate that the Wallula project is a minor hazardous air pollutant source and therefore not subject to MACT. Please see Chapter 3 of this Final EIS for updated text.
- 18-5. Sections 3.2 and 3.17 have been revised to reflect the most recent air quality submittals to EFSEC and their permit writer at Washington Department of Ecology. Please see Chapter 3 of this Final EIS for updated text.
- 18-6. Sections 3.2 and 3.17 have been revised to reflect the most recent air quality submittals to Ecology. Please see Chapter 3 of this Final EIS for updated text.
- 18-7. The Draft EIS has been revised to indicate that stormwater will not be captured but rather allowed to infiltrate into the ground after passing through an oil-water separator. Similarly, the discussion of water rights has been revised to eliminate the discussion regarding obtaining a water right for the use of stormwater. Please see Chapter 3 of this Final EIS under Section 3.3.
- 18-8. We agree with this comment. The Wallula project would be subject to Walla Walla County's noise ordinance (if it were not under EFSEC jurisdiction) which is nearly identical to Ecology's noise regulation. Section 3.9 in Chapter 3 of this Final EIS has been updated to reflect this information.